

As to the continued need for federal USF funding in the proposed service areas, Mr. Shively explained that with increased and improved coverage, Centennial's customer base would grow, requiring the placement of additional expanders. Centennial typically uses a 90-day engineering cycle to plan for and deploy needed expanders. During the first 60 days, Centennial reviews traffic levels and identifies areas where build-up is needed. During the next 30 days, additional expanders are deployed. The 90-day engineering cycle is repeated throughout the year.

Mr. Shively assured the Presiding Officers that Centennial would only use high cost universal service funds for their intended purpose and only in the geographic areas for which the funding was received, noting however, that Centennial operates its network on an integrated basis across its various licensed entities. He also testified that Centennial is committed to meeting all record requirements ordered by the Commission, including but not limited to those related to customer complaints, maintenance, receipt and use of universal service funds, and compliance with capital improvement plans used to demonstrate Centennial's need for high cost universal service funding.

I. Centennial's responses to IURC's Data Requests.

Centennial responded to the data requests issued by the Commission in docket entries dated June 15, 2004 and July 12, 2004.¹¹ Centennial provided the Commission with various maps depicting the county boundaries, city locations, RSA/MSA boundaries, location of active cell/towers operated by Centennial, and multiple signal levels, and distinguishing "roaming" areas from Centennial's "in-network" calling areas. Centennial also identified for the Commission the number of customers for each of the named Petitioners, the other states where Centennial currently receives USF funds, and the amount of funds it currently receives. Centennial also provided the Commission with detailed engineering information concerning each of Centennial's cell sites, including transmitting location, antenna height and type, transmitted power levels and FCC defined service area boundaries. Centennial explained that service quality is continuously monitored, and weekly reports are generated detailing dropped call rates and blocking levels. Centennial also provided the Commission with its current quality of service performance data.

J. Centennial's responses to OUCC's Data Requests.

Centennial also submitted additional information and documents into the record in response to the data requests which the OUCC served upon Centennial.¹² Centennial stated that the responses Centennial provided to the OUCC in discovery performed in Centennial's first ETC proceeding remain the same. Centennial also provided the OUCC with maps depicting Centennial's FCC-licensed service area boundaries and the territories of the RLECs within Centennial's licensed service area. Centennial also provided the OUCC with copies of the

¹¹ As discussed *infra*, portions of the information and data Centennial submitted to the Commission was deemed confidential, trade secret information and was submitted into the record of this cause subject to confidential protection and treatment.

¹² A portion of the information and data Centennial submitted initially to the OUCC and then into the record pursuant to the parties' stipulation was deemed confidential, trade secret information and was submitted into the record of this cause subject to confidential protection and treatment.

various orders by other state/territory commissions granting Centennial ETC designation. Centennial also provided detailed customer count information, as well as updated certificates from the Indiana Secretary of State's Office demonstrating that Mega Comm LLC, Elkhart Metronet, Inc., and Centennial Randolph Cellular LLC are validly existing Indiana corporations who are in good standing with the Indiana Secretary of State's Office. Centennial also provided the OUCC with a copy of its most recent Form 10 K filing with the Securities Exchange Commission and a copy of Centennial's proposed capital budget for Fiscal Year 2005.

K. Centennial's Supplemental Testimony Presented by Witness Jeffrey L. Shively.

At the November 3, 2004 evidentiary hearing, Centennial's witness, Jeffrey L. Shively, sponsored his supplemental testimony prefiled with the Commission on October 8, 2004, including Centennial's revised Exhibits E and E-1 incorporating the five exchanges inadvertently omitted from its original proposed Exhibits E and E-1. Pursuant to stipulation by the parties, Mr. Shively was permitted to provide additional testimony addressing several matters not addressed in his prefiled supplemental testimony, including an overview of the FCC's *Advantage Cellular Decision*, which was not released until after his supplemental testimony had been prefiled with the Commission. Mr. Shively was also cross-examined by the OUCC and INECA and answered questions from the Presiding Officers.

Mr. Shively stated that Centennial's proposed ETC service area includes the Burrows, Deer Creek, Yeoman, Roselawn, and Buffalo exchanges, and explained that these exchanges were inadvertently omitted from Centennial's original Exhibits E and E-1 attached to its Renewed Application. Mr. Shively also attached to his supplemental testimony Revised Exhibits E and Revised Exhibit E-1, which he proposed be substituted in lieu of original Exhibits E and E-1 attached to Centennial's Renewed Application. As Mr. Shively explained in his supplemental testimony, Revised Exhibits E and E-1 incorporated the five exchanges inadvertently omitted by Centennial's original exhibits and incorporated several other cleanup changes concerning identification of counties, RLECs, and RLEC exchanges falling within Centennial's proposed ETC service area. Mr. Shively's supplemental testimony further explained the basis for Centennial's initial request that four RLEC exchanges, Mulberry, Colfax, Fairmount, and Markleville, be split in order to be coterminous with Centennial's FCC-licensed area.¹³ Mr. Shively's supplemental testimony also demonstrated that its initially proposed splitting of these four RLEC exchanges did not raise any "creamskimming" issues as the portions to be included within Centennial's ETC service area include a significant amount of the rural, high cost areas for these exchanges.

Mr. Shively testified at the November 3, 2004 evidentiary hearing concerning the FCC's recently released *Advantage Cellular Decision* and how this decision affected Centennial's then pending request that the Commission split the Mulberry, Colfax, Fairmount, and Markleville exchanges. As Mr. Shively explained, the FCC recognized in its *Advantage Cellular Decision* that a wireless ETC applicant whose FCC-license area does not encompass the entirety of an existing RLEC exchange should be permitted to include those limited portions of the RLEC exchange that fall outside of the wireless applicant's FCC-licensed area, provided that such

¹³ As explained below, this request was later withdrawn.

applicant commits to serving customers throughout the entirety of these exchanges through a combination of its own facilities or resale or roaming agreements with other carriers. Mr. Shively further testified that Centennial was committed to serving customers within the entirety of the Mulberry, Colfax, Fairmount, and Markleville exchanges, including those limited portions that fall outside of its FCC-licensed area consistent with the commitments made in the *Advantage Cellular Decision*. Mr. Shively confirmed for the Commission that Centennial had roaming agreements with "just about all" of the small and traditional wireless carriers in Indiana that provides its customers with state-wide coverage. Mr. Shively confirmed for the Commission that in light of the FCC's *Advantage Cellular Decision* Centennial did not seek to "split" the Mulberry, Colfax, Fairmount, and Markleville exchanges, but instead, seeks to include those limited portions of these four exchanges that fall outside of its FCC-licensed area within Centennial's proposed ETC service area.¹⁴

L. OUCC's Prefiled Testimony Presented by Ronald L. Keen.

Pursuant to stipulation by the parties, the OUCC introduced into the record as Public's Exhibit 1 the prefiled *Testimony of Ronald L. Keen*, Director of the Telecommunications Division of the OUCC. Mr. Keen's prefiled testimony explained that the OUCC's initial concern with whether adequate statutory, public notice would be provided to the public and RLECs was resolved by the Commission setting a second evidentiary hearing for the specified purpose of taking additional evidence with respect to Centennial's request to incorporate the five exchanges inadvertently omitted from its original exhibits. Mr. Keen's prefiled testimony also noted several discrepancies with respect to identification of the exchanges to be split as a result of Centennial's proposed ETC service area with the OUCC identifying as many as 11 "split" exchanges compared to Centennial identifying only four "split" exchanges. Pursuant to the parties' stipulation entered on the record at the November 3, 2004 evidentiary hearing, the OUCC acknowledged that Centennial's Exhibit 5 consisting of its October 29, 2004 letter to the OUCC addressed and resolved the discrepancies previously noted in Mr. Keen's prefiled testimony.

6. Discussion and Findings.

As we are reviewing this application for a second time, much of this evidence is, in effect, repetitive. While we ultimately denied Centennial's application in the first Centennial Order, we did not do so for a failing on the nine required elements. Instead, our concerns

¹⁴ Splitting a single RLEC exchange, as Centennial had originally proposed, is a separate and distinct question from dividing or "redefining" an RLEC's "study area." An RLEC's "study area" is normally an RLEC's entire service area within a state, frequently comprised of multiple exchanges/wire centers. The FCC will normally "disaggregate" or "redefine" an RLEC's study area into its constituent exchanges for USF purposes when a wireless ETC serves some, but not all, of those exchanges. This is not permitted, however, when it results in so-called "creamskimming," as discussed in the *Virginia Cellular* and *Highland Cellular* rulings. In contrast, the so called "splitting" of a single RLEC exchange involves a wireless applicant's request to be designated as an ETC "below the wire center level of a RLEC" due to the geographic limitations of the applicant's FCC-license. See, *Virginia Cellular* and *Highland Cellular* rulings. As recently acknowledged by the FCC in the *Advantage Cellular Decision*, the FCC prefers not to "split" existing RLEC exchanges, but instead, prefers to permit wireless ETC applicants to serve those limited portions of the RLEC exchanges falling outside of applicant's FCC-licensed territory; provided that such applicants can serve the entirety of the exchange through their own facilities, roaming, or resale. See, *Advantage Cellular Decision*, Paragraph 21, footnote 65.

focused on whether or not Centennial's designation met the public interest test required under the application process for a CETC. Based on the evidence of record, we find that Centennial meets the eligibility criteria for ETC designation as contained in Section 214(e)(1), as set out more fully below.

A. Petitioner is a Common Carrier.

The first requirement for ETC designation is status as a common carrier under federal law. A "common carrier" is generally defined in 47 U.S.C. §153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications utilizing either wire or radio technology. The FCC's regulations specifically provide that a specialized mobile radio service, such as that provided by Centennial, is a common carrier service. See 47 C.F.R. § 20.9(a)(4). Centennial is therefore a "common carrier" for purposes of obtaining ETC designation under 47 U.S.C. § 214(e)(1). (Renewed App., Ex. A.)

B. Petitioner Provides Each of the FCC's Supported Services.

The record evidence confirms that Centennial's network can provide each of the supported services required of an ETC, and Centennial will offer all of those services to its universal service customers once designated an ETC (Renewed App. Ex. A, para. 3; Shively Testimony, pp. 7-12.)

i. Voice-grade access to the public switched telephone network. The FCC defines voice-grade access as "a functionality that enables a user of telecommunications service to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call." 47 C.F.R. § 52.101(a)(1). Centennial certified through its Renewed Application that it provides voice grade access to the PSTN. Through its interconnection arrangements with local telephone companies, including SBC Indiana, United Telephone Company of Indiana d/b/a Sprint, and Verizon, North, Inc. and in some limited circumstances its transport services arrangement with its current long distance provider QWEST, all Indiana customers of Centennial are able to make and receive calls on the PSTN. (Renewed App. Ex. A, para. 3; Shively Testimony, p. 7.)

ii. Local usage. Beyond providing voice-grade access to the PSTN, an ETC must include an amount of free local usage determined by the FCC as part of its universal service offering. 47 C.F.R. § 54.101(a)(2). The FCC has not quantified a minimum amount of local usage required to be included in a universal service offering, and has declined to require that ETCs offer unlimited local usage.¹⁵ Centennial certified in its Renewed Application that it provides local usage and attached as Exhibit B to the Direct Testimony of Jeff Shively a copy of its current rate plans for Indiana; all of which include some minimum free local usage. (Renewed App., Ex. A, paragraph 3; Shively Testimony, p.8, Ex. B attached thereto.)

¹⁵ See *In the Matter of Federal-State Joint Board on Universal*, CC Docket No. 96-45, Order and Order on Reconsideration, FCC 03-170, ¶ 14 (rel. July 14, 2003) ("July 2003 Order").

iii. Dual-tone, multi-frequency ("DTMF") signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, carriers that provide signaling that is functionally equivalent to DTMF meet this service requirement. 47 C.F.R. 54.101(a)(3). Centennial certified through its Renewed Application that it provides dual tone multi-frequency signaling or its equivalent. Centennial uses out-of-band digital signaling and in-band MF signaling that are functionally equivalent to DTMF signaling. (Shively Testimony, p. 8.) Centennial also has the ability to pass DTMF signaling over its TDMA and GSM systems. (Shively Testimony, p. 8.)

iv. Single-party service or its functional equivalent. "Single-party service" means that only one party will be served by a subscriber loop or access line, in contrast to a multi-party line 47-C.F.R. § 54.101(a)(4). Centennial meets this requirement by providing a dedicated message path for the length of all customer calls. (Shively Testimony, p. 9.)

v. Access to emergency services. The ability to reach a public safety answering point ("PSAP") by dialing 911 is required in any universal service offering. Access to emergency services includes access to both 911 and E911 by a telecommunications user. 47 C.F.R. 54.101(a)(5). Both ultimately connect a customer to local government through a PSAP, created by the local government. E911 has the ability to provide automatic numbering information ("ANI"), which allows the PSAP to call back if the call is disconnected, as well as automatic location information ("ALI"), permitting the PSAP to identify the geographic location of the calling party. Centennial certified through its Renewed Application that it is in compliance with 911 protocols. (Renewed App., Exhibit A.) The record further reflects that Centennial currently provides all of its customers with access to emergency services by dialing 911 in satisfaction of this requirement. (Shively Testimony, p. 9; Exhibits C and D attached thereto.) In addition, Centennial has fully implemented Phase I E911 in Indiana and has deployed Phase II E911 service requests where it has received valid requests from PSAPs. (Shively Testimony, p. 9; Exhibits C and D attached thereto.) Mr. Shively confirmed at the evidentiary hearing that Centennial is both E911 Phase I and Phase II compliant. (TR. 48.) Based on the record, we find that Centennial satisfies the access to emergency services requirement.

vi. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. 47 C.F.R. § 54.101(a)(6). Centennial certified through its Renewed Application that it provides access to operator services. (Renewed App., Exhibit A.) The record further reflects that Centennial meets this requirement by providing all of its customers with access to operator services provided by either Centennial or an outside contractor which provides automated operator assistance services, such as Verisign, pursuant to which a customer can dial "0" and receive automated assistance to place a call with a credit card, calling card or prepaid card, or make a collect call. (Shively Testimony, p. 10.) Centennial's customers may also dial "611" and be connected to a representative at Centennial's call center, who can place the call for customers. (Shively Testimony, p. 10.)

vii. Access to interexchange service. A universal service provider must offer consumers access to interexchange service to make and receive interexchange calls. 47 C.F.R. § 54.101(a)(7). Centennial presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements Centennial has with one or more interexchange carriers (IXCs). (Shively Testimony, p. 10.) Centennial does not offer equal access to other interexchange carriers, but this is a service that the FCC and this Commission has declined to require of ETCs. See, Nextel Order, p. 20. While not providing equal access, Centennial's customers are able to reach their IXC of choice by dialing an appropriate access number provided by the IXC. (Shively Testimony, p. 10.)

viii. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. 47 C.F.R. § 54.101(a)(8). Centennial meets this requirement by providing all of its customers with access to directory assistance by dialing "411" or "xxx-555-1212," which results in a direct connection to Verisign, which is presently under contract with Centennial to provide this service to Centennial customers. (Shively Testimony, p. 11.)

ix. Toll limitation for qualifying low income customers. An ETC must offer toll limitation services to qualifying Lifeline customers at no charge. 47 C.F.R. § 54.101(a)(9). "Toll limitation" is defined as "toll blocking" or "toll control" if a carrier can provide both. 47 C.F.R. § 54.400(d). Centennial is unable, at this time, to provide "toll control." However, Centennial certified in its Renewed Application and through Jeff Shively's testimony that Centennial can and will offer "toll blocking" to qualifying low income customers, at no charge, as part of its universal service offering upon designation as an ETC by the Commission. (Renewed App., Exhibit A; Shively Testimony, p. 11.) The record further reflects that Centennial will provide toll blocking service by amending a requesting customer's profile in Centennial's switching equipment which will block toll calls attempted from the customer's phone. (Shively Testimony, p. 11.)

C. Petitioner Will Satisfy Advertising Requirements.

The third requirement for ETC designation is that a carrier agrees to advertise the availability of the supported services and charges using media of general distribution. 47 U.S.C. § 214(e)(1). To date neither the FCC nor this Commission has adopted any specific advertising guidelines for any ETC. Centennial certified through its Renewed Application that it would advertise the availability of its supported services and associated charges using media of general distribution as required by law. The record further reflects that Centennial will advertise the availability of Lifeline/Link Up programs through newspaper advertising, explanatory written materials at Centennial's retail stores, and by posting information on the USAC sponsored public access website. (Shively Testimony, p. 14.) No party challenged Centennial's evidence that it can and will advertise through media of general distribution as required by law. We find that Centennial meets the advertising requirement for ETCs. We further find that Centennial is required to comply with all form and content requirements, if any, adopted by the FCC or this Commission in the future and required of all ETCs.

D. Petitioner's Designated ETC Service Areas.

Centennial presented clarifying evidence as to its proposed ETC service areas through Revised Exhibits E and E-1 attached to the Supplemental Testimony of Jeffrey L. Shively, as well as the live testimony Mr. Shively presented at the November 3, 2004 evidentiary hearing. 47 U.S.C. 214(e)(5) defines the term "service area" as a geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms. For an area served by a rural telephone company, 47 U.S.C. § 214(e)(5) provides that the term "service area" means the rural telephone company's "study area," unless and until the FCC and a state commission establish different service areas under the procedures set forth in 47 C.F.R. § 54.207(c)-(d).

In Centennial's Revised Exhibit E, Centennial identifies the specific exchanges/wire centers located within the study areas of the RLECs for which Centennial seeks designation as an ETC, including five exchanges, Burrows, Deer Creek, Yeoman, Roselawn, and Buffalo, that were inadvertently omitted from its original Exhibits E and E-1 attached to its Renewed Application. In Revised Exhibit E-1, Centennial filed a boundary map showing its complete service area in the State of Indiana. Revised Exhibit E-1 also identifies the specific RLEC exchanges/wire centers included within Centennial's proposed ETC service area as well as those limited portions of the RLEC exchanges/wire centers that fall outside of Centennial's FCC-licensed service area in Indiana.

i. Re-designation of Centennial's ETC service area.

Centennial's Revised Exhibit E and Revised Exhibit E-1 attached to Centennial's Exhibit 5 (Supplemental Testimony of Jeffrey L. Shively) clarify that Centennial's proposed ETC service area includes the exchanges of Burrows, Deer Creek, Yeoman, Roselawn, and Buffalo and we find no reason not to include these areas within Centennial's ETC designated service area. Accordingly, we grant Centennial's request to incorporate the RLEC exchanges of Burrows, Deer Creek, Yeoman, Roselawn, and Buffalo within its designated ETC service area as depicted in Centennial's Revised Exhibits E and E-1. We also find that noticing and holding the second evidentiary hearing on November 3, 2004 to address the addition of these five exchanges into Centennial's proposed ETC service area eliminated the concern raised by the parties with respect to Centennial's request to incorporate these five exchanges. Specifically, the parties raised, and we concur, that the public must have adequate notice as to the relief requested, the areas impacted, and the sufficiency of service, all of which have now been addressed. Further, the complicating factor of potentially "split" wire centers needed to be, and has now been, resolved..

We further find that Centennial's designated ETC service area should include those limited portions of the Mulberry, Colfax, Fairmount, and Markleville exchanges that fall outside of its FCC-licensed area as designated in its Revised Exhibits E and E-1. Consistent with the *Advantage Cellular Decision*, the Commission may incorporate limited portions of RLEC exchanges that fall outside of Centennial's FCC-licensed area, provided that Centennial commits to offer services to customers in the entirety of these exchanges through a combination of its own facilities and resale of other wireless or wireline services. At the November 3, 2004 evidentiary

hearing, Centennial clarified on the record that it did not seek to split these four exchanges, but instead, and in light of the FCC's recently released *Advantage Cellular Decision*, sought to serve the entirety of the Mulberry, Colfax, Fairmount, and Markleville exchanges. Centennial, through Mr. Shively's live testimony at the November 3, 2004 evidentiary hearing, made the same commitments to serve the entirety of these four exchanges as recognized by the FCC in the *Advantage Cellular Decision*. Specifically, Mr. Shively committed Centennial to serve customers in the entirety of these exchanges through a combination of its own facilities and roaming or resale agreements with other carriers.

ii. Redefinition of certain RLEC study areas.

While Centennial no longer seeks to "split" any RLEC exchanges/wire centers as a result of its ETC designated service area, Centennial still seeks to redefine certain RLEC study areas whose exchanges are not located within or contiguous to Centennial's proposed ETC service area. The specific RLEC study areas that need to be redefined based upon Centennial's final statement of its designated ETC service area are: Tri-County Telephone, Frontier Communications, Hancock Telephone, CenturyTel of Central Indiana, Smithville Telephone Company, Inc. and Northwestern Indiana Telephone Company. Centennial seeks redefinition of these study areas because it is not permitted under its current FCC licenses to provide service in the entire study area of each of these companies. Centennial states that as a wireless carrier, it is restricted to providing service only in those areas where it is licensed by the FCC. Centennial's evidence further reflects that it is not "creamskimming" or picking and choosing the "lowest cost exchanges" of the affected rural telephone companies, but instead it bases its requested ETC area on its licensed service area and proposes to serve the entirety of that area. Centennial further contends that its proposed redefinition of the affected rural telephone companies' service areas is consistent with the FCC's January 22, 2004 Memorandum Opinion and Order issued *In the Matter of Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an [ETC]*, FCC 03-338 (released January 29, 2004) ("Virginia Cellular Decision") which Centennial submitted into the record as its Late-Filed Exhibit 3.

We find that Centennial's designated ETC service area satisfies applicable federal and state requirements. We conclude that redefining the rural study areas at the exchange/wire center level for Tri County Telephone, Frontier Communications, Hancock Telephone, CenturyTel of Central Indiana, Smithville Telephone Company, Inc., and Northwestern Indiana Telephone Company, as requested by Centennial, is appropriate. Under the FCC's current rules, receipt of high-cost support by Centennial will not affect the total amount of high-cost support that RLECs receive. Moreover, redefining the service areas of the affected rural telephone companies will not change the amount of universal service support that is available to these carriers. This finding is subject only to Centennial securing the FCC's agreement to redefining these RLEC study areas pursuant to 47 C.F.R. 54. 207. We expect Centennial to attach a copy of this order to indicate to the FCC that we approve these study area redefinitions, and to advise us of the FCC's action thereon.

E. Additional Factors to be Considered by the Commission.

Once we have completed the checklist of required items under 47 C.F.R. 54.101, we move on to the equally required item of the public interest. To place that in context, we must examine the tenets of universal service.

i. Universal Service

The promise of universal service is a guarantee to the public that service will be available at just, reasonable, and affordable rates. *In the Matter of Federal-State Joint Board on Universal Service*, 18 FCC Rcd 2943 (2002). To guarantee universal service, TA-96 required that all telecommunications carriers contribute into a Universal Service Fund ("USF") on an equitable and nondiscriminatory basis. 47 U.S.C. 254(f). This fund is used to act as a counterbalance for those carriers entering traditionally high cost areas, such as rural or insular areas. "Universal service contributions . . . support[] the expansion of, and increased access to, the public institutional telecommunications network." *Texas Office of Public Utility Counsel v. FCC*, 183 F.3d 393, 427 (5th Cir. 1999) ("TOPUC"). The designation of an ETC by a state commission is the necessary precursor for eligibility for USF, but merely being an ETC does not guarantee USF funding; a carrier must actually provide the enumerated services. *In re the Application No. C-1889 of GCC License Corp.*, 623 N.W.2d 474, 481 (S.D. 2001). The designation of an ETC provides the public with the certainty that there will be a carrier of last resort that provides services determined to be necessary. 47 U.S.C. 214. ETCs are required, at the risk of sanctions, to provide service to designated customers at affordable prices. 47 U.S.C. 214(d); see also *GCC License Corp.*, 623 N.W.2d at 477. The designation of ETC status, and access to the USF, is not a guarantee of a rate of return to a carrier, nor a guarantee of subsidy. *Alenco Communications, Inc. v. FCC*, 201 F.3d 608, 620-21 (5th Cir. 2000).

ii. Public Interest Analysis

47 U.S.C. 254(b) sets out the standards under which we must examine the issue of whether granting Centennial ETC status is in the public interest. These standards include quality of service and rates, access to advanced services, and access in rural and high cost areas. State commissions are granted the authority to determine whether such certification is in the public interest. *In the Matter of Federal-State Joint Board on Universal Service*, 15 FCC Rcd 15168, 15184 n.6 (2000).

In areas served by rural telephone companies, a competitive ETC can be designated only upon a finding that the designation will serve the public interest. 47 U.S.C. § 214(e)(2). Congress did not define or limit states' public interest tests under Section 214(e)(2), leaving it to the states to set their own reasonable parameters for public interest analyses for rural service areas, consistent with the underlying purposes of the Act, namely:

To promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies.

Pub. L. No. 104-104, 110 Stat. 56 (1996).

Section 254(b)(3) of the Act provides that rural consumers should have access to services that are comparable to those available in urban areas:

Consumers in rural, insular, and high cost areas should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.

Apart from the promotion of competition, we are not aware of any authority showing that there is any specific limitation on the factors that the Commission may take into account when making a public interest determination. *WWC Holding Co., Inc. v. Public Service Commission*, 442 Utah Adv. Rep. 8, 44 P.3d 714, 719 (2002). Under Section 214(e) of TA-96, the Commission is given the discretion of how many carriers to designate within a given area, but is not prohibited from imposing its own reasonable eligibility requirements. *TOPUC*, 183 F. 3d at 418. This is consistent with the historical role states play in guaranteeing service quality standards for local service *Id.*

State commissions are granted the authority to make the designation because of a unique awareness of states' needs and problems. What is examined, however, is dependant upon the duty to the public. "[C]ustomers' interest, not competitors', should control agencies' decisions affecting universal service." *Washington Independent Telephone Assn. v. Washington Utilities and Transportation Comm.*, 110 Wn. 498, 41 P.3d 1212, 1218 (2002). "Public interest is a broad concept encompassing the welfare of present and future consumers, stakeholders, and the general public. The 'public interest' is broader than the goal of competition alone...[and] broader than the goal of advancing universal service." *Washington Independent Telephone Assn. v. Washington Utilities and Transportation Comm.*, 149 Wn.2d 17, 27, 65 P.3d 319, 324 n.3 (2003) (citations omitted.)

In addition, 47 U.S.C. §253(b) allows states to impose requirements on the provision of telecommunications services that are necessary to preserve universal service, protect public safety and welfare, ensure the continued quality of services, and protect the rights of consumers. *In the Matter of Federal-State Joint Board on Universal Service*, 15 FCC Rcd at 15176. This authority, however, is tempered by the requirement that such regulation be competitively neutral. *Id.* While there is the mandate that the state's regulations not be inconsistent with the FCC's rules, the statute contemplates state regulation that adopts "additional specific predictable, and sufficient mechanisms" to preserve and advance universal service. 47 U.S.C. §254(f).

Given these explicit statutory mandates, it is clear that Congress intended that state commissions are to play a critical and necessary role in the determination of competitive ETCs in rural areas. We turn, then, to the particulars supporting a finding that the designation of Centennial as an ETC is in the public interest.

a. Commission Regulatory Oversight of USF Expenditures

This Commission has previously recognized certain requirements that all ETC applicants must satisfy in order to secure and maintain their ETC status in Indiana. *See, Nextel Order*, pp. 28-30. These stem from the FCC's mandate that state commissions certify that the federal USF funds are being used "only for the provision, maintenance and upgrading of facilities and services for which the support is intended," consistent with 47 U.S.C. §254(e). "Absent such a certification, carriers will not receive such support." *Id. In the Matter of Federal-State Joint Board on Universal Service*, 16 FCC Rcd 11224, ¶187 (2001); 47 C.F.R. §54.314. In order for this Commission to satisfy its ETC certification obligations to the FCC, this Commission requires ETC applicants to present evidence concerning: (i) their proposed Lifeline/Link Up offering, including filing a Lifeline/Link Up tariff with the Commission; and (ii) how the applicants will account for their USF fund expenditures and the accounting protocols they intend to use to track such expenditures.

The designation of an ETC creates both benefits and burdens on a telecommunications provider. While designation gives the right to apply for USF funds, it also creates the obligation to use those funds "only for the provision, maintenance, and upgrading of facilities and services for which support is intended." 47 U.S.C. 254(e). While the Commission does not regulate Centennial's rates, the Commission does have an affirmative duty to oversee the rates of ETCs, especially regarding Lifeline/Link Up tariffs. Without such oversight, the Commission cannot be assured that a carrier is not using its ETC status to competitive – and public – disadvantage. "An ETC is obliged, at the risk of financial sanctions, to serve designated customers at appropriate prices." 47 U.S.C. 214(d). State utility commissions are required to "determine which common carrier or carriers are best able to provide such service to the requesting underserved community or portion thereof . . ." 47 U.S.C. 214(e)(3); *GCC License Corp.*, 623 N.W.2d at 477. Hence, for this Commission to ensure rate comparison, we require ETC applicants to submit Lifeline/Link Up tariffs for Commission review.

We further find that our Lifeline/Link Up tariff filing requirement does not constitute inappropriate regulation of "the entry of or rates charged" by a wireless carrier. 47 U.S.C. §332(c)(3). Numerous courts have noted that even the imposition of a mandatory contribution to a state USF does not amount to rate regulation when applied by a state commission to a wireless carrier. *TOPUC*, 183 F.3d at 431-432, *citing Sprint Spectrum L.P. v. State Corp. Commission*, 149 F.3d 1058, 1061 (10th Cir. 1998). Instead, this falls into the category of "other terms and conditions" that a state commission may regulate regarding wireless carriers. 47 U.S.C. §332(c)(3).

The record reflects that Centennial will satisfy the Commission's Lifeline/Link Up tariff filing requirement. (Renewed App., p. 8; Shively Testimony, p. 14 and Exhibit E attached thereto; Motion to Supplement Shively Testimony, pages 1-2 and Revised Exhibit E attached thereto.) Centennial submitted into the record an illustrative tariff, as amended, describing the Lifeline/Link Up programs Centennial intends to offer once it receives designation as an ETC.¹⁶

¹⁶ *See, Exhibit E attached to Shively Testimony; Revised Exhibit E attached to Motion to Amend Shively Testimony.*

Centennial's illustrative tariff, as amended, conforms to the FCC's recently announced Lifeline/Link Up eligibility requirements by the FCC. *See In the Matter of Lifeline and Link-Up, Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 03-109, FCC 04-87 (Released April 29, 2004). We believe that the terms and rates Centennial proposes for its universal service offerings in its illustrative tariff are "just, reasonable, and affordable" and otherwise consistent with universal service goals. Therefore, Centennial should file a Lifeline/Link Up tariff with the Commission's Telecommunications Division consistent with Centennial's illustrative Lifeline/Link Up tariff submitted into the record of this proceeding prior to making its universal service offering to eligible consumers in Indiana.

Consistent with this Commission's ETC oversight responsibilities, we also require ETC applicants to present evidence of what accounting protocols will be used to track and account for USF expenditures. As previously recognized by this Commission, "the subsidy of competitive services by non-competitive services is prohibited in the provision of universal service." *Nextel Order*, p. 29 citing 47 U.S.C. §254(j). This Commission is charged with the obligation of establishing such "necessary costs allocation rules, accounting safeguards, and guidelines" to ensure that USF-funded services bear no more than a reasonable share of the joint and common cost. *Id.* Without such oversight, this Commission cannot assure that Centennial, or any other ETC, is using USF funds in a manner consistent with the statutory mandate.

The record reflects that Centennial will satisfy this requirement. Centennial stated that it has established protocols within its finance department to separately track the receipt and use of USF funds that it currently receives from USAC with respect to other states where Centennial has received ETC designation. (Shively Testimony, p. 24.) Centennial further committed to track its USF expenditures in Indiana separately from its non-USF expenditures to ensure that funds received from USAC for Indiana are only spent on relevant projects in Indiana. (Shively Testimony, p. 24.) Separate and in addition to the Commission's annual high-cost certification filing under Cause Nos. 40785 and 42067, Centennial has committed to submit records and documentation detailing its progress towards meeting its build-out plans and upgrading of service in the service areas it is designated as an ETC. (Shively Testimony, pp. 24-25.)

Consistent with precedent, we find that Centennial shall file reports with the Commission detailing its progress in the expansion and upgrading of service. Specifically, Centennial shall file its first report six (6) months from the date of this order, and annually thereafter, setting out the following:

- Its specific plan using USF funds for the "provision, maintenance and upgrading of facilities and services;"
- Areas where signal strength is to be improved, with corresponding footprint redefinition;
- Timetable for implementation of new switches, towers, and all improvements to service that are set to be started on a date certain;
- Current status of previously reported projects and timelines;

-Number of complaints filed by Indiana customers with the FCC, IURC, or other regulatory entities, tracking customer problems by exchange, indicating the date and the type of resolution achieved; number of requests for service in its designated Indiana service area that were unable to be completed due to lack of facilities or signal.

Centennial shall also report annually the amount of USF funds received, per USF program, per exchange served. This level of detail will address our concerns regarding the overlap of Centennial's footprint over state lines, as we must assure that the allocated funds are used for the benefit of Indiana customers. As a result of Centennial's assurances regarding their now-withdrawn request for the "splitting" of exchanges, Centennial should also file a summary report regarding any partnering, collocating or roaming agreements between Centennial and any other entity within the affected ETC exchanges at issue herein.

To the extent that any such reports contain confidential matter that constitute trade secrets as defined under Indiana law, Centennial may request confidential protections pursuant the Commissions' then-current policies.

In conclusion, we find that these items further the Commission's goal of ensuring that Centennial satisfies its obligations under 47 U.S.C. 214(e) to provide supported services throughout its designated service areas.

b. Network Infirmities and Cost Discrepancies

The premise of universal service contains within it the recognition of network infirmities. But for those infirmities, the concept of universal service would focus exclusively on low-income support. Hence, in an examination of an ETC designation request, an applicant must make specific offerings of proof as to how it will remedy any infirmities it may have identified in its system, or show how it will improve existing service with the USF funds it seeks. The Commission specifically requires that ETC applicants make a thorough review of their service offerings and determine what, if any, parts of the system must be upgraded to be consistent with the then-current FCC guidelines for ETCs.

The record reflects that Centennial has performed a thorough review of its existing network, facilities, and service offerings and has identified specific upgrades and improvements to be made with USF funds, which in all likelihood would not be made without such funds. The record further reflects Centennial's plans to remedy any known infirmities in its network.

As a result of its review of its existing network, Centennial identified seven prospective new cell sites that it proposes to construct¹⁷ using federal USF funds which would improve

¹⁷ At the evidentiary hearing, Mr. Shively explained that only four of the proposed new cell sites would involve actual construction of a new cell tower and that three of Centennial's proposed new cell site locations would involve collocation on another party's existing cell tower. (TR., p. 51.) However, as further explained in Mr. Shively's testimony, there are significant costs associated with the development and construction of a new cell tower, ranging anywhere from \$288,000 to \$305,000, as well as collocating facilities and equipment on another party's cell tower, which costs approximately \$166,000. (TR., pp. 51-52.)

service in those sparsely populated areas where Centennial has requested designation as an ETC in Indiana. (Shively Testimony, pp. 19-20.) Centennial stated that construction of these new cell sites will improve Centennial's service coverage area and remedy most, if not all, of the "gaps" or "dead spots" that Centennial identified in its proposed ETC service area. The seven proposed new cell sites are positioned to cover the largest population centers in these rural underserved areas in Indiana. Centennial submitted into the record, subject to confidential protection, maps (identified as Exhibit F-1 and Exhibit F-2 to Jeff Shively's testimony) which depict Centennial's existing network and the "gaps" or "dead spots" existing therein as well the Centennial's proposed seven new cell site locations which Centennial proposes to develop with USF funds. Centennial confirmed for the Commission that its existing network was consistent with FCC guidelines for ETCs and that most, if not all, of the "gaps" and "dead spots" identified in its proposed ETC service area would be remedied by construction of the seven proposed new cell sites. (Shively Testimony, p. 20.) Centennial also confirmed at the evidentiary hearing that the proposed seven new cell sites are sites that would not be constructed and/or developed but for USF funding. (TR. 39.)

We find that Centennial has adequately described its existing network and the improvements to be made to its network to improve service in the area where it seeks designation as an ETC, which would not otherwise be made without USF funding. Where "gaps" or "dead spots" have been noted in Centennial's network, Centennial has specified where upgrades to service – in the form of construction of new cell towers or collocation of facilities and equipment on existing towers – would be made with USF funds. Furthermore, Centennial has made assurances to the Commission that USF funds received will be used to benefit Indiana by expansion of its existing service coverage.

Related to the Commission's requirement that an ETC applicant show how network infirmities will be addressed and remedied is the Commission's requirement that an ETC provide quality service. *Nextel Order*, p. 26; *Centennial Order*, p. 29. We previously rejected assertions by wireless ETC applicants that the Commission has no jurisdiction over such applicants with respect to service quality standards. From a public policy and public interest standpoint, the certification of an ETC – designed to be, as necessary, the carrier of last resort – presents an assurance to the public that service will be universal, as promised. As a consequence, the designation of an ETC brings with it a corresponding degree of oversight to insure that an ETC provides adequate quality service. In securing this designation, Centennial has voluntarily subjected itself to the jurisdiction of this Commission. While we recognize that a strict application of the Commission's quality standards would not be technologically neutral, we do premise Centennial's ETC designation on the expectation that it will provide quality service.

The record reflects that Centennial has provided the Commission with appropriate assurances that it provides and will continue to provide quality service. In recognition of its' network coverage "gaps" or "dead spots," Centennial has appropriately assured the Commission that such gaps in coverage will be addressed and remedied if granted ETC status. The record further reflects that Centennial was one of the first wireless carriers to sign onto and adopt the CTIA Consumer Code for Wireless Service which is posted on Centennial's website. (Shively Testimony, pp. 26-27.) Centennial also committed to reporting consumer complaints to the Commission (as described in the Commission's *Nextel Order*). (Shively Testimony, p. 2.) Accordingly, we find that Centennial satisfies the Commission's ETC requirement that it provide

quality service and we premise our designation of Centennial as an ETC upon its continued provision of quality service.

c. Competition

In making a determination of whether or not an ETC designation is in the public interest, competition is one element to be considered. As we have previously recognized, "universal service and competition must be balanced; one must not be sacrificed to supplant or benefit the other." *Nextel Order*, p. 30 (citing *Washington Independent Telephone Assn. v. Washington Utilities and Trans. Comm.*, 149 Wn.2d 17, 27, 65 P.3d 319, 324 (2003), citing *Alenco Communications, Inc. v. FCC*, 201 F.3d 608, 615 (5th Cir. 2000); see also *Washington Independent Telephone Assoc. v. Washington Utilities and Transportation Comm.*, 110 Wn. 498, 516, 41 P.3d 1212 (2002), citing *In the Matter of Federal-State Board on Universal Service*, 12 FCC Rcd at 8801-03; *In the Matter of Federal-State Board on Universal Service*, 13 FCC Rcd at 5365.

We have specifically rejected arguments focusing exclusively upon the value of increased competition and touting the general benefits of competition. *Centennial Order*, p. 25. "Competition, in and of itself, is not the reason for ETC designation." *Centennial Order*, p. 25. Instead, we require ETC applicants to present evidence addressing a multitude of factors as enumerated by the FCC in *Virginia Cellular*. The FCC described the relevant factors to be considered as follows:

We conclude that the value of increased competition, by itself, is not sufficient to satisfy the public interest test in rural areas. Instead . . . we weigh the benefits of increased competitive choice, the impact of the designation on the universal service fund, the unique advantages and disadvantages of the competitor's service offering, any commitments made regarding quality of telephone service, and the competitive ETC's ability to satisfy the obligation to serve the designated service areas within a reasonable time frame.

Virginia Cellular, para. 4.

We also have emphasized that any examination of competition must focus on whether the competitive force created by certification of the ETC applicant will benefit consumers. *Nextel Order*, p. 31. An ETC applicant must specify the improvement it will make in the marketplace that will serve the goals of universal service. *Centennial Order*, p. 25.

The record reflects that Centennial has satisfied its burden of proof of establishing that its universal service offering will provide benefits to rural Indiana consumers. If granted ETC status, Centennial has committed to becoming a carrier providing ubiquitous service in its designated ETC areas, to constructing at least four new cell towers and collocating its facilities and equipment on three existing cell towers, thereby improving service and coverage in currently underserved rural areas in Indiana. Further, Centennial currently anticipates that it will receive approximately \$1.2 million annually if granted ETC status (Shively Testimony, p. 22.) Centennial also anticipates that its annual investment in Indiana will substantially exceed the amount of USF funds it anticipates receiving in Indiana as a result of its designation as an ETC.

"For every dollar of USF money to be received by Centennial, Centennial will more than match those dollars with its own financial investment in Indiana's telecommunications infrastructure." (Shively Testimony, p. 23.) Considering the amount of USF funds Centennial anticipates receiving for Indiana along with the amount of Centennial's own funds that it anticipates investing in Indiana, Centennial is committing to make a significant investment in Indiana's telecommunications network, which will benefit currently underserved rural Indiana consumers.

Centennial also presented evidence concerning the benefits and advantages its service offering brings to Indiana rural consumers.¹⁸ (Shively Testimony, pp. 17-18.) Centennial presented evidence that its service provides customers with larger calling areas than those offered by the RLECs, which subject its customers to fewer toll charges. (Shively Testimony, p. 18.) Centennial also noted mobility as a positive aspect of its wireless service, which provides its customers with access to telecommunications services in situations where they would otherwise not be available, especially in situations where access to emergency services is needed. (Shively Testimony, pp. 17-18.) While we recognize the various benefits and advantages that Centennial's wireless service will bring to its proposed ETC area, we must remain competitively neutral and refrain from declaring a particular feature of a technology "better." Accordingly, we consider technology-based issues, such as mobility and a larger local calling scope associated with wireless technology, within the context of how it serves the public interest.

Centennial also presented evidence and made specific commitments concerning how it will address requests for service from customers who are located within Centennial's requested ETC-designated service area, but who are unable to receive service because they are outside Centennial's existing coverage. Acknowledging that construction/collocation of the seven new proposed cell sites should greatly mitigate this issue, Centennial committed to track and annually report to the Commission the number of customers who request service from Centennial within Centennial's ETC-designated area, but who are unable to receive service because they are outside of Centennial's existing network coverage. (Shively Testimony, pp. 21-22.) With respect to such requests, Centennial also committed to evaluate whether: (1) the requesting customer's equipment can be modified or replaced to provide service; (2) adjustments can be made to the nearest cell site to provide service; (3) adjustment can be made to the existing network, including adding additional radios, additional electronics or other equipment; (4) any other adjustments can be made to the network or customer facilities to provide service; and (5) an additional cell site, cell extender or repeater can be deployed or constructed to provide service. (Shively Testimony, p. 22.) As Mr. Shively confirmed at the evidentiary hearing, Centennial would try to figure a way to serve any customer requesting service in its ETC designated area. (TR. 31.)

We find that Centennial's public interest showing here is sufficient based on the specific commitments Centennial has made to expand its network, cure "dead spots," provide quality service and become a reliable carrier of last resort, as well as its promise to provide the Commission with appropriate documentation on the utilization funds. Furthermore, designating

¹⁸ With respect to perceived disadvantages, Centennial acknowledged a single, limited disadvantage associated with its wireless service offering which is that limited portions of its service area are subject to dropped calls or poor coverage. (Shively Testimony, pp. 18-19.) However, Centennial's commitment to use USF funds received for Indiana to remedy "gaps" or "dead spots" within its network mitigates, if not resolves, this issue.

Centennial as an ETC in Indiana will bring approximately \$1.2 million annually to underserved rural areas of Indiana. When this amount is placed in context of Centennial's testimony that every dollar of USF money is more than matched by Centennial's investment in Indiana, this results in a significant investment in Indiana's telecommunications infrastructure, especially in underserved rural areas. Accordingly, we find that Centennial has satisfied the "public interest" factor required of competitive ETC applicants.

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION that:

1. Centennial's application for designation as an Eligible Telecommunications Carrier ("ETC"), as that term is defined in 47 U.S.C. 214(e) and FCC Order 97-157, is hereby granted and Centennial is designated an ETC for portions of its rural licensed service area in Indiana to the extent described herein..

2. Centennial's request for authority to apply for and receive federal universal service funds pursuant to 47 U.S.C. 254 is hereby granted.

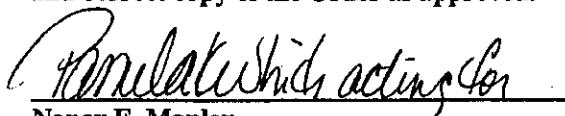
3. Centennial's request to redefine the RLEC study areas for Tri-County Telephone, Frontier Communications, Hancock Telephone, CenturyTel of Central Indiana, Smithville Telephone Company, and Northwestern Indiana Telephone Company, Inc. is hereby granted, subject to securing the FCC's approval with respect to redefining these study areas pursuant to 47 C.F.R. 54.207.

4. Centennial's verified requests seeking confidential protection of documents and information designated by Centennial to be confidential previously filed with the Commission on May 21, 2004 and July 6, 2004 is hereby granted on an on-going basis.

5. This Order shall be effective on and after the date of its approval.

McCARTY, LANDIS, RIPLEY AND ZIEGNER CONCUR; HADLEY ABSENT:
APPROVED DEC 15 2004

I hereby certify that the above is a true
and correct copy of the Order as approved.


Nancy E. Manley
Secretary to the Commission

Revised Exhibit E

Centennial has customers in thirty-seven (37) of the ninety-two (92) counties in Indiana, with the greatest population of subscribers in the northern and eastern regions of Indiana.

The following is a list of the rural areas in which Centennial operates, and the independent telephone companies currently serving each area:

Centennial Operating Entity	County	Rate Center	ILEC
South Bend Metronet, Inc.	Carroll	Camden	Camden Telephone Company
South Bend Metronet, Inc.	Carroll/Cass	Burrows	Camden Telephone Company
South Bend Metronet, Inc.	Carroll/Cass	Deer Creek	Camden Telephone Company
South Bend Metronet, Inc.	Clinton	Colfax	Tri-County Telephone Company
South Bend Metronet, Inc.	Clinton	Mulberry	Mulberry Cooperative Telephone Company
Elkhart Metronet, Inc.	Elkhart	New Paris	New Paris Telephone Company
South Bend Metronet, Inc.	Fulton	Rochester	Rochester Telephone Company
South Bend Metronet, Inc.	Carroll	Yeoman	Yeoman Telephone Company
Mega Comm LLC	Grant	Fairmount	Frontier Communications
Mega Comm LLC	Grant	Sweetser	Sweetser Rural Telephone Company
Mega Comm LLC	Grant	Swayzee	Swayzee Telephone Company
Centennial Randolph Cellular LLC	Henry	New Lisbon	New Lisbon Telephone Company
Centennial Randolph Cellular LLC	Henry	Markleville	Hancock Rural Telephone Company
Mega Comm LLC	Huntington	Warren	Citizens Telephone Company
Mega Comm LLC	Grant	Warren	Citizens Telephone Company
Michiana Metronet, Inc.	Wells	Warren	Citizens Telephone Company
Centennial Cellular Tri-State Operating Partnership	Jasper	Demotte	Northwestern Indiana Telephone Company
Centennial Cellular Tri-State Operating Partnership	Newton/Jasper	Mount Ayr	Northwestern Indiana Telephone Company
Centennial Cellular Tri-State Operating Partnership	Newton	Roselawn	Northwestern Indiana Telephone Company
Centennial Cellular Tri-State Operating Partnership	Noble	Ligonier	Ligonier Telephone Company
Elkhart Metronet, Inc.	Elkhart	Ligonier	Ligonier Telephone Company

Centennial Operating Entity	County	Rate Center	ILEC
Centennial Cellular Tri-State Operating Partnership	Pulaski	Star City	Pulaski-White Rural Telephone Company
South Bend Metronet, Inc.	Fulton	Star City	Pulaski-White Rural Telephone Company
Centennial Cellular Tri-State Operating Partnership	White/Pulaski	Buffalo	Pulaski-White Rural Telephone Company
Mega Comm LLC	Tipton	Kempton	CenturyTel of Central Indiana
South Bend Metronet, Inc.	Clinton	Kempton	CenturyTel of Central Indiana
Mega Comm LLC	Tipton	Sharpsville	Smithville Telephone Company
Mega Comm LLC	Tipton	Tipton	Tipton Telephone Company
Michiana Metronet, Inc.	Wells/Adams	Craigville	Craigville Telephone Company
Michiana Metronet, Inc.	Wells	Liberty Center	Citizens Telephone Company
Centennial Cellular Tri-State Operating Partnership	White	Brookston	CenturyTel of Central Indiana
South Bend Metronet, Inc.	Carroll	Brookston	CenturyTel of Central Indiana
Centennial Cellular Tri-State Operating Partnership	White/Jasper	Monon	Monon Telephone Company

Centennial requests ETC designation in the telephone exchanges located in the counties listed above.

EXHIBIT B

Exhibit B

Indiana RLEC	Wire Center(s) Inside Centennial's Indiana Service Area	Wire Center(s) Outside Centennial's Indiana Service Area
Tri-County Telephone Company	Colfax	Linden Romney Wingate
Hancock Rural Telephone Corp.	Markleville	Maxwell McCordsville
CenturyTel of Central Indiana, Inc.	Kempton Brookston	Battleground
Smithville Telephone Company, Inc.	Sharpsville	Ellettsville French Lick Gosport Griffin Hymera Lake Monroe Lizton Lyons Owensburg Smithville Stanford
Northwestern Indiana Telephone Company, Inc.	Demotte Mount Ayr Roselawn	Hebron Lake of the Four Seasons